

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

*In re Application of Makhpal Karibzhanova
for Judicial Assistance Pursuant to
28 U.S.C. § 1782*

Case No. 21-mc-00442

[PROPOSED] PROTECTIVE ORDER

Upon the motion of Vladislav Kim to Intervene and to Modify Subpoenas and for a Protective Order and upon good cause shown, it is hereby:

ORDERED that all subpoenas issued by John Moscow (“*Moscow*”) of Lewis Baach Kaufmann Middlemiss PLLC as Commissioner pursuant to this Court’s June 15, 2021 Order [DE 9] granting Makhpal Karibzhanova’s application for judicial assistance pursuant to 28 U.S.C. § 1782 are modified to exclude production of any documents or testimony concerning the following entities: LAFONDA INVEST PTE. LTD. (Singapore); LAFONDA HOLDING PTE. LTD. (Singapore); LAFONDA LIMITED (Cyprus); NAVONO LIMITED (Cyprus); SIGIRIYA LTD (Belize); ENIGMA INVEST PTE. LTD. (Singapore); BERGUOLLA LIMITED (Cyprus); ARATAN CAPITAL PTE. LTD. (Singapore); and ALGARIA LIMITED (Cyprus) (collectively, the “*Subject Entities*”);

ORDERED that to the extent any person or entity subpoenaed by Moscow as Commissioner has complied with a request for information concerning the Subject Entities such information shall be promptly destroyed and Moscow shall maintain a certification of such destruction for inspection by this Court should the need arise;

ORDERED that to the extent any person or entity subpoenaed by Moscow as Commissioner has complied with a request for information concerning the Subject Entities any person or entity in possession of such information shall be prohibited from using such information for any purpose;

ORDERED that Moscow as Commissioner shall not issue any subpoenas seeking documents or testimony concerning the Subject Entities without further order of this Court; and

ORDERED that Moscow as Commissioner shall serve a copy of this Order on all persons issued subpoenas which sought information concerning the Subject Entities.

Dated: _____, 2021

Hon. Katherine Polk Failla